# **EXHIBIT C**

## In The Matter Of: RUTH V. BRIGGS v. TEMPLE UNIVERSITY

JIE WU May 31, 2017

Terry Burke Reporting
Registered Professional Reporters
terryburkermr@gmail.com
(215) 205-9079

Min-U-Script® with Word Index

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1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE EASTERN DISTRICT OF PENNSYLVANIA
3	
4	RUTH V. BRIGGS, :
5	Plaintiff, : Civil Action
6	v. : No. 16-00248
7	TEMPLE UNIVERSITY,
8	Defendant.
9	
10	Philadelphia, Pennsylvania Wednesday, May 31, 2017
11	
12	
13	Deposition of JIE WU, taken pursuant
14	to notice, held at Console Mattiacci Law, LLC,
15	1525 Locust Street, Ninth Floor, Philadelphia,
16	Pennsylvania, beginning at 10:00 a.m., on
17	Wednesday, May 31, 2017, before Terry Barbano
18	Burke, RMR-CRR.
19	
20	
21	
22	TERRY BURKE REPORTING (215) 205-9079
23	terryburkermr@gmail.com
24	

2

1	APPEARANCES:
2	RAHUL MUNSHI, ESQUIRE
3	Console Mattiacci Law, LLC 1525 Locust Street, Ninth Floor Philadelphia Parasalasania 18182
4	Philadelphia Pennsylvania 19102
5	Counsel for the Plaintiff
6	RACHEL FENDELL SATINSKY, ESQUIRE Littler Mendelson, P.C.
7	Three Parkway 1601 Cherry Street, Suite 1400
8	Philadelphia, Pennsylvania 19102
9	Counsel for the Defendant
10	
11	JIE WU,
12	SERC Center, 035-10, 1925 North 12th
13	Street, Room 362, Philadelphia,
14	Pennsylvania, having been duly sworn, was
15	examined and testified as follows:
16	BY MR. MUNSHI:
17	Q. Good morning, Dr. Wu.
18	A. Good morning. How are you?
19	Q. My name is Rahul Munshi. I am an
20	attorney here at Console Mattiacci Law, and I
21	have the privilege of representing Ruth Briggs
22	in this action that has been brought against
23	Temple.
24	You are here for your deposition.

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Temple? 1 2 I'm a professor computer science -computer and information sciences, and also I'm 3 a center director. The center name is called 4 5 Center for Networked Computing. 6 And also I have a side job as 7 associate vice provost for international affairs. 8 9 Q. And that is at Temple University as well? 10 Yes, that's at Temple University. 11 12 Are you the chair of any department 13 currently? 14 I resigned last year. A. Not. 15 Q. What were you the chair of? Chair of department of computer and 16 information sciences. 17 18 And you resigned from that position in the year 2016? 19 20 Α. Yes. 21 Why did you resign? 0. 22 It's like my term ends, two terms. 23 extended one year.

#### **TERRY BURKE REPORTING**

Q. Your term ended, is that what you said?

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1	Α.	And at Temple, there is a Confucius
2	Institut	te in the university. So there are two
3	director	rs. Both directors report to me.
4	Q.	Anybody else report to you directly
5	right no	ow?
6	Α.	No.
7	Q.	In the year 2014, 2013/2014 period, were
8	you the	chairman of the department back then?
9	A.	Yes.
10	Q.	And you were also a professor back then;
11	correct'	?
12	Α.	Yes.
13	Q.	And back in the years 2013/2014, can you
14	estimate	e for me the number of people who
15	reported	d directly to you?
16	A.	It's about 50.
17	Q.	Five zero?
18	A.	Yes, five zero.
19	Q.	What is your date of birth, Dr. Wu?
20	A.	July 5th, '61.
21	Q.	Where were you born?
22	Α.	Shanghai, China.
23	Q.	When did you move to the United States?
24	7\	Tanuary 16 1007

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MS. SATINSKY: Objection to form. 1 2 You can answer the question. 3 THE WITNESS: Yes, yes. BY MR. MUNSHI: 4 5 Did you ever have a discussion with Ruth 6 Briggs about China's retirement law? We never discussed from the law 8 perspective. But we discuss after my travel, I usually always have discussion with Ruth, share 9 10 my experience of my travel. So I think at one point we discussed about it. But nothing for 11 12 retirement. Just say womens retire early. 13 What do you recall about those 14 conversations you had with Ruth Briggs? 15 A. When? 16 What do you recall about it? 17 Oh, just it's kind of very casual conversation. We just shared experience of 18 culture. I just mentioned that, you know, women 19 retire early. 20 21 Q. Did you tell her that in China it is 22 actually the age 55 for some women? 23 A. No, no, no. 24 Q. So you just said women retire early, but

you didn't say what age? 1 A. Yes, actually I mentioned --MS. SATINSKY: Just wait until he is 3 finished asking the question. 5 THE WITNESS: Sorry. 6 MS. SATINSKY: That is okay. 7 will come out cleaner for the transcript. BY MR. MUNSHI: 8 Q. Did you say anything about the age, specific number of age, or did you just say 10 11 early? 12 I don't remember exactly, but I do 13 mention cases women retire very early, including my sister. 14 Q. When you said "very early," what were 15 16 you referring to? 17 Early could be 40, 50, women last job. 18 Do you remember when you had this conversation with Ruth Briggs? 19 20 It's awhile ago. Maybe five years, six A. 21 years ago. 22 Q. And was this one conversation or did you 23 have multiple conversations with her regarding 24 the culture in China?

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- A. I just remember once.Q. Do you remember where this conversation
- 3 took place?

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- A. In my office.
- Q. And what prompted this conversation?

  Did she ask you about the culture in China or did you just offer it yourself?
- A. No. I don't remember the content, but we discussed many things.
- Q. And we are just talking right now about this concept that over in China --
  - A. Yeah.
  - Q. -- there is this mandatory law; right?
- A. No, no, I never discussed mandatory law.
- 15 I just said women retired early and there are
- 16 many cases, certain job -- for certain
- discipline, they required young women. Like in
- 18 the restaurant. More labor.
- Q. And now we are talking about China; right?
- 21 A. Yes, China.
- Q. And is it your understanding that this is a cultural characteristic of China?
- A. No, not really, because Chinese, after

Ruth. Okay? 1 A. Yeah. 2 3 Q. Did you have an understanding when you had this conversation with Ruth that she was in 4 her 50s? 5 6 MS. SATINSKY: Objection. Asked and answered. You can answer the question. 7 THE WITNESS: Yeah, I think so, 8 9 because she and I probably similar age. BY MR. MUNSHI: 10 11 Q. Did you ever say to her words to the 12 effect of most women in China do retire at the 13 age of 55? 14 MS. SATINSKY: Objection. Asked and 15 answered. 16 You can answer the question. THE WITNESS: I don't think so. I 17 don't put a number, like 55. But even we have 18 these conversations, nothing to do with 19 retirement. Just discussed the culture things. 20 BY MR. MUNSHI: 21 22 Q. When you say it had nothing to do with 23 retirement, what do you mean by that? 24 A. Because we have a long conversation,

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like a one-hour conversation, so we talk about 1 different culture, the habit of eating, the 2 habit of working. So this is just like a very 3 4 small piece of conversation. 5 Q. And do you make it known at your job at Temple that you are from China? 7 A. Oh, everyone knows by looking. 8 Ο. Everyone knows that you are from China? 9 A. Yes. 10 Did you ever say, Dr. Wu, words to the effect that women in China are put out to 11 12 pasture at age 55? 13 No, I never say that word. I don't even know that word. 14 Which word? 15 Q. The word you just said. 16 17 Ο. Pasture? 18 Α. Pasture, yeah. Never heard that word before in your 19 20 life? 21 A. No. 22 MR. MUNSHI: Let's have this 23 document marked as P-3. 24 (P-3 was marked for identification.)

Q. With whom did you discuss this specific discipline in the dean's office?

- A. Usually Greg and Drew.
- Q. I just want to be super specific here, so I don't want to talk about what usually happens or what typically happens or what generally happens. Just looking specifically at this disciplinary report that is P-6.
  - A. Uh-huh.

- Q. Do you recall speaking with anybody in the dean's office prior to issuing this discipline to Ruth Briggs?
- A. I would say yes, because for any unwritten disciplinary things, I consult with the dean's office. They help me to identify or suggest the level of violation.
- Q. Do you recall having any conversation with Greg Wacker prior to issuing this discipline that is  $\underline{P-6}$  regarding this discipline?
- A. I don't remember exact procedure, but I always consult with dean's office.
- Q. Again, my question is just going to be your specific knowledge. If you don't know, you

1 THE WITNESS: I don't recall who. 2 But I would say Greg and Drew together. 3 BY MR. MUNSHI: 4 Who was the first person to raise the 5 issue of potentially giving Ruth Briggs a 6 discipline at this time? Again, I don't recall who's the person who initiate this, but it's just a sequence of 8 this misconduct. Then I contact the dean's 10 office. Then they suggest that we can do -first verbal and then written. 11 12 O. Verbal what? Verbal to inform Ruth. Because we have 13 Α. 14 a weekly meeting. 15 Verbal to inform Ruth about the 0. discipline? 16 17 Α. Yeah. 18 Or about what? 0. 19 About whatever the misconduct or her 20 performance. 21 What verbal conversations did you have with Ruth regarding this discipline prior to 22 23 giving it to her, if any? 24 A. Again, I don't remember the exact

A. Again, I talked to several people in HR.
I think she's one of them.

- Q. Do you recall the names of anybody else in human resources who you spoke with about Ruth Briggs?
  - A. Either Deidre or Sharon, yeah.
  - Q. Sharon Boyle?
  - A. Yes.

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- Q. Anybody else besides Deidre and Sharon Boyle who you recall speaking with in human resources about Ruth Briggs prior to her termination?
- A. I don't recall. I only remember these two names.
- Q. Did Deidre Walton ever tell you that Ruth Briggs had conversations with her about you?
  - A. She didn't tell me.
- Q. Did Sharon Boyle ever tell you that
  Miss Briggs had conversations with her about
  you?
  - A. No, she didn't.
- Q. Did you ever learn from Greg Wacker that
  Miss Briggs had gone to human resources or the

1 EEO office or legal about you? 2 MS. SATINSKY: Prior to the end of her employment at Temple? 3 MR. MUNSHI: Correct. 4 5 THE WITNESS: No, I did not know. BY MR. MUNSHI: 6 7 Q. Did you ever learn from Drew DiMeo that Ruth Briggs had gone to human resources, EEO or 8 9 legal prior to her termination about you? MS. SATINSKY: Objection to form. 10 11 You can answer. 12 THE WITNESS: He did not. 13 BY MR. MUNSHI: 14 Prior to joining Temple, you had worked 15 at a different university; right? 16 Α. Yes. 17 Would you say that you have been 18 managing employees in one capacity or another for over 20 years? 19 20 Employee sounds like research associate, 21 TA's in some programs, and at the National Science Foundation I managed the whole program. 22 23 Q. And in the year 2014, within your prior 24 capacity as the chair, you were managing around

faculty or from staff. 1 Q. Do you think that would be something you 2 would remember if Ruth Briggs did in fact 3 complain to you? 5 A. Oh, yeah, yeah. Because I feel very 6 proud after working seven years no one made any 7 complaint to me. Q. Did Ruth Briggs ever complain to you that she felt like you were treating her 9 differently than other staff members? 10 She never directly complained to me. 11 12 MR. MUNSHI: Let's have this 13 document marked as P-9, please. (P-9) was marked for identification.) 14 15 BY MR. MUNSHI: Q. Dr. Wu, in front of you is a document 16 17 that has been marked as P-9. Please take time to read it. 18 (Pause.) 19 Α. 20 Okay. 21 On the first page of P-9, there is an e-mail from Ruth Briggs to you dated 22 November 9th, 2010. 23 24 Do you see that?

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Dr. Kwanty about Ruth Briggs' e-mail to you that 1 she writes in here in P-9 about her treatment in 3 the workplace? MS. SATINSKY: Objection to form. 5 THE WITNESS: Again, I don't recall. BY MR. MUNSHI: 6 7 Q. How about Justin Shi? I don't recall. 8 Α. How did it make you feel to receive an e-mail from Ruth Briggs where she talks to you 10 about fairness and treatment and equal applying 11 standards applied for staff members? 12 13 I feel that I gave her simple work. She 14 didn't complete it. And she not giving the 15 truth that she complete it. She told me that she complete it, but never sent the result back 16 17 Then she complain all this problem with computer. That's her practice always, the 18 19 tactic. 20 Instead of admitting the errors or 21 problems, she comes up with all kinds of 22 excuses. 23 And did you consider her e-mail to you

#### **TERRY BURKE REPORTING**

in November of 2010 explaining an excuse?

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1	A. Yes. I just feel that it's her opinion
2	about the fairness and the standard.
3	Q. Was that upsetting to you to have a
4	staff member for the first time raising an issue
5	with you about fairness in the workplace?
6	A. No, it's not upsetting. I'm not really
7	upsetting about her as a person. Just upsetting
8	her performance.
9	Q. So the fact that she wrote this e-mail
10	to you, her manager, about how she feels she is
11	being treated, that didn't upset you?
12	A. Again, she upset me on many other
13	things. I don't recall this stand out.
14	Q. Were you surprised to get an e-mail from
15	her where she talks about her treatment in the
16	workplace?
17	MS. SATINSKY: Objection to form.
18	THE WITNESS: Obviously there was
19	some surprise, but not to the extent that I
20	report to HR.
21	BY MR. MUNSHI:
22	Q. Did you think that she had any basis to
23	complain to you about how the standards are
24	heing applied to her?

Did anybody from HR or the EEO office or 1 2 anybody at Temple ever ask you if you were treating Ruth the same way as other people prior 3 to her termination? 5 MS. SATINSKY: Objection to form. 6 You can answer. 7 THE WITNESS: Again, no one questioned the way I treat Ruth. I treat 8 everyone just the same. 10 BY MR. MUNSHI: Q. And did anybody at Temple ever inform 11 you that they were looking into concerns that 12 13 Ruth raised about you? 14 MS. SATINSKY: Objection to form. 15 Prior to the end of her employment? BY MR. MUNSHI: 16 Prior to the end of her termination? 17 No. Actually, I never know that Ruth is 18 A. 19 complaining about me. 20 At any point did you learn that Ruth 21 Briggs was submitting job applications 22 internally at Temple? 23 This I know. I think she tried many 24 places, but was not successful.

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1 Q. Do you have any understanding as to why she wanted to transfer away from you? 2 3 MS. SATINSKY: Objection to form. 4 THE WITNESS: Oh, it's clear because she understand that she's not suitable for her 5 6 job as the executive assistant. BY MR. MUNSHI: 7 8 Do you know what her job was before she started reporting to you? 9 10 A. Yes. 11 Ο. What was that? 12 A. She's executive assistant to dean. 13 Q. So she had the same job title before you 14 were even --15 A. Oh, yes, yes. And when she was the executive assistant 16 0. to the dean, are you aware of any conversations 17 18 about potentially firing her for bad 19 performance? I do not know. Actually, when I joined 20 21 Temple I was very happy that Ruth can work with me because she's very friendly when I interview. 22 23 She's the one like meet and greet me. So I feel 24 very happy that she can work with me.

1	Q. Did that change at some point that you
2	no longer felt happy working with her?
3	A. Oh, yeah, once you start working with
4	her, you know her performance.
5	Q. At what point did you reach that
6	conclusion?
7	A. Oh, very early. Because she some time
8	make a decision by her own without informing me.
9	Like her office, she make a huge office.
10	Q. What do you mean by that?
11	A. You know, her office like a cubicle. So
12	she just decide to up the size of her office
13	just the first few days of her work.
14	Q. When did you first think about firing
15	her?
16	MS. SATINSKY: Objection to form.
17	THE WITNESS: I don't recall. But
18	this is after at least a year with all the
19	struggles.
20	BY MR. MUNSHI:
21	Q. When was the first time, if ever, you
22	have a discussion with somebody about firing
23	her?
24	MS. SATINSKY: Objection to form.

earlier, I don't want to know usually or generally or typically.

- A. Yeah, I'm pretty sure it was Greg.
- Q. Do you have a specific recollection of talking with Greg about issuing Ruth Briggs this discipline?
- A. Yes, because this is everyone in the department knows this incident.
- Q. What do you recall discussing with Greg prior to issuing this discipline?
- A. I don't recall. I just report the fact. Then we have a long discussion. Then we come up the level of disciplinary.
- Q. Do you recall having conversations with anybody else besides Greg about issuing this discipline to Ruth Briggs?
- A. Oh, yes, I always discuss with two associate chair.
- Q. And again, I just want to caution you that I am not talking about usually or always.
- A. No, definitely I talked to both associate chairs.
- Q. What do you recall discussing with Justin Shi about issuing this discipline?

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1	A. I don't recall the exact conversation.
2	Because the whole department is waiting for the
3	candidate to come to conduct interview. We set
4	up itinerary, then the same day find out the
5	ticket never issue.
6	Q. Whose decision was it to give her a
7	three-day suspension instead of a written
8	warning or any other form of discipline?
9	A. Again, it's a collective decision.
10	Q. And collective in this instance of who?
11	Not usually in this instance. Collectively
12	means who?
13	A. It means me and Greg, maybe Drew.
14	Q. And Drew, you said?
15	A. Yeah, and Drew. Drew's always in the
16	loop.
17	Q. Do you recall any conversations with
18	Drew DiMeo about issuing Ruth Briggs this
19	specific discipline?
20	A. I don't recall.
21	Q. Whose decision was it to classify this
22	as a Level C discipline?
23	A. I'm not expert in terms of deciding the
24	level. I always consult with the dean's office.

discipline or written warning to Judy Lennon? 1 2 I don't recall. It could be one, but maybe not. I issued many times verbal warning. 3 I never issued written warning without a verbal 4 warning first. 5 6 And Hailey King, did you ever give her a written warning about --8 No. But I have a very serious verbal warning with her. That's during the hurricanes. 9 Q. Was the very serious --10 11 MS. SATINSKY: I don't think he was finished. 12 13 THE WITNESS: During the hurricane. BY MR. MUNSHI: 14 15 Q. During the hurricane? 16 Yes. She was absent for a couple days. A. This very serious verbal warning that 17 0. you gave to Hailey King, is there any note about 18 19 it? A. 20 No. 21 Did you inform anybody in writing? 22 No. It's not in writing, but many 23 people knows. Justin Shi knows. 24 Q. And what was the issue with Hailey King?

1	A. Oh, she just disappear. Not disappear.
2	But out of reach, maybe out of power for a
3	couple days and no one knows where she is, she
4	was. So when she come back, then we have
5	serious conversation with her.
6	Q. So there were a couple of days where she
7	didn't show up to work?
8	A. No.
9	Q. And there were a couple of days where
10	she didn't inform you about whatever her
11	situation was?
12	A. Yeah, yeah. But that's during the
13	hurricane.
14	Q. And during that hurricane for a couple
15	of days she didn't e-mail you?
16	A. She didn't e-mail me.
17	Q. And during that hurricane for a couple
18	of days she didn't call you; right?
19	A. She didn't call me.
20	Q. She didn't call anybody in the office;
21	right?
22	A. Yeah, probably not. That's why we have
23	serious conversation.
24	Q. But nothing written down?

#### Message

From:

jiewu13@gmail.com (jiewu13@gmail.com)

Sent:

11/9/2010 7:30:09 AM

To:

Ruth V. Briggs (rbriggs@temple.edu); JIE WU [jiewu@temple.edu]

CC:

Alexandra Grinshpun [alexg@temple.edu]

Subject:

Re: Issues related to proofread

Ruth, for Li's paper (assigned last Fri) please send me your proof (acrobat) on Thursday after you complete the proof of CIS booklet on Wed. Please note that the submission deadline is Fri. I really need it by Thur. Thanks again for your help. Jie Wu

Sent via BlackBerry from T-Mobile

From: "Ruth V. Briggs" <rbriggs@temple.edu>

Date: Tue, 9 Nov 2010 05:17:29 -0500

To: JiE WU<jiewu@temple.edu>

Cc: Alexandra Grinshpun<alexg@temple.edu> Subject: Re: Issues related to proofread

Dr. Wu,

Please note that it is nearly 4:30 am. Attached you will find three versions of the responses to the reviewers' questions. While I am certain that you will you will believe me to be incompetent, both of the publisher proofs on which I worked diligently throughout the evening and night were in pdf format. I used acrobat professional for my edits. I encountered not problems with the reviewer's document. The first save I attempted on Li's proof, I got an error message, so I tried to print it so that I would not lose my work. I got a similar error message with a different code. Pulled out all the tricks I could remember and when I was so filled with anxiety that I could not breath, the application crashed, then the computer crashed. Rebooted to find two documents (proofs) with none of my comments. I did a "save as" for the reviewer's doc earlier, but it was too much on a night when I was exhausted from a stressful week of work in one day and one more admonishing email from you to expect a disciplinary action upon your return. It is really difficult be in battle. While I have no defense against anything that comes my way, it would be nice to have fairness in treatment and equal applying standards applied for staff members.

So I will wait for my disciplinary action. Because it doesn't matter that I am the only one who will stay here for you past work hours or work on the weekends for you... When something goes wrong in this department, It makes sense to blame it on someone who is working because the if you are not working, mistakes are less likely to happen. I have heard that other department staff and faculty use my name in vain also.

Let me know if you want me to do hand written comments on Li's proof and see is I can find a scanned to send to you.  $\bullet$ 

Have a great trip.

On Mon, Nov 8, 2010 at 11:35 PM, JIE WU <jiewu@temple.edu> wrote:



Ruth,

I would like to put this in our record that you never gave me back the paper proof given to you last Friday. I was told today that you have done that, but left at home. So far, I have not received anything from you nor with the 6 page proofread of another document that I gave you today.

I want to make sure that all these should not be any reason for possible delay of your Tuesday and Wednesday assignment, i.e. to complete the proofread of CIS department booklet that we have agreed last week.

Jie Wu, Ph.D Professor and Chairman, Fellow of the IFEF Computer and Information Sciences Temple University Tel: 2.15-204-8450, Fax: 215-204-5082 Email: jiewu@temple.edu